

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

No.: 6:24-cv-0306

**PROPOSED INTERVENOR DEFENDANT CHIRLA'S
CERTIFICATE OF INTEREST**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and JCB-CV-7.1, Proposed Intervenor Defendant Coalition for Humane Immigrant Rights (CHIRLA) states that it has no parent corporation and that no publicly held company has an ownership interest of 10% or more.

Dated: August 26, 2024

Respectfully submitted,

/s/ Esther H. Sung

Esther H. Sung* (Lead Attorney)

California Bar No. 255962

esther.sung@justiceactioncenter.org

Karen C. Tumlin*

California Bar No. 234961

karen.tumlin@justiceactioncenter.org

Hillary Li*

Georgia Bar No. 898375

hillary.li@justiceactioncenter.org

Laura Flores-Perilla*

California Bar No. 355645

laura.flores-perilla@justiceactioncenter.org

* *pro hac vice motion forthcoming*

Brandon Galli-Graves*
Texas Bar No. 24132050
brandon.galli-graves@justiceactioncenter.org

Vanessa Rivas-Bernardy*
California Bar No. 341464
vanessa.rivas-
bernardy@justiceactioncenter.org

JUSTICE ACTION CENTER
P.O. Box 27280
Los Angeles, CA 90027
Telephone: (323) 450-7272
Facsimile: (323) 450-7276

Counsel for Proposed Intervenor Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2024, I electronically filed this motion with the Clerk of the Court for the United States District Court for the Eastern District of Texas by using the CM/ECF system. Counsel in this case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Esther H. Sung

Esther H. Sung